To: Nate Lau
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Subject: United Heckathorn Paragraphs

MIDWAY, CO was the preferred disposal site because of its logistical and economic advantages. The site is within 10 miles of a Burlington Railroad spur where off-loading onto trucks was planned to complete the trip to Midway. A dedicated fleet of about 25 trucks was to be used. Burlington was the preferred transporter because of reliable scheduling and service. Four dedicated trains of approximately 60 cars each were dedicated to the project, with a round trip cycle for each train, including unloading time, estimated at 5.5 days. It is estimated that it would take approximately 14 train loads/trips to transport all of the waste. Additional economic advantages were that the entire trip would be powered by Burlington on Burlington right-of-way. Because of this, Burlington was able to bid the job at a competitively advantageous price and with a service and scheduling guarantee that no other railroad was able to match. Disposal rates at Midway were also competitively priced because the dredge spoils would be stockpiled for use as daily cover (about a 12 month supply). Currently, Midway needs to mine their daily cover.

BUTTERFIELD, AZ is the first back up site, but is considerably y more costly than Midway because it requires a combined rail haul using both Burlington and Southern Pacific. SP's service is notoriously poor and unreliable, according to WMI. SP is unable to haul direct from the site because it is short of engines to pull the train, and does not have an adequate inventory of railcars. Burlington is unwilling to let SP haul all the way because Burlington is providing most o the rolling stock. The total cost o a combined Burlington/SP run to Butterfield, is considerably more than the cost to haul the waste to Colorado. Under the Butterfield plan, Burlington would haul the load to Colton, where SP would pick it up. Round trip train time would be a minimum of 7 days, and would p probably be longer, due to SP's chronic shortage of engines at Colton. The truck haul from the train siding to the disposal facility is about 4 miles, all on paved highway. Twelve dedicated trucks would be used and the routing does not go by the school in Mobile. The unreliability of SP service was experienced over the last week, when SP has been unable to provide engines to move 40 loaded rail cars off-site, however a partial train of only 5 cars is evidently en route. (SP and Burlington agreed to have SP haul the first train to leave the site by SP only).

KETTLEMAN. The most feasible way to transport the material to Kettleman is by truck, but this is precluded by the ROD. It would require about 120 truck/day to keep up with the dredging schedule. Kettleman is about 240 miles from the site. If hauled by rail, the waste would railed by Burlington to a t transfer station 48 miles south of the site, and then hauled by truck from the transfer station to the disposal facility. About 60 dedicated trucks would be used. In order to use the transfer station for the Heckathorn waste, a DTSC permit would need to be secured, including the CEQA process. This would require a minimum of 60 days, if no objections were received by DTSC. EJ issues could also arise in the process.

ECDC, East Carbon, UT is accessed only by rail. It is a non-RCRA, waste, Subtitle D facility, according to WMI. It is a former carbon strip mine. Preferred mode of transportation into the facility is by bottom dumps, al though the facility is also equipped to tilt gondolas to empty them. Normally, rail cars are loaded with coal on the return trip. Logistically, the entire haul would be by SP, and would probably overload their Richmond facility, because most of their Richmond facility is dedicated to servicing the industrial coke imported through the Richmond Levin terminal . SP does not have sufficient yard space to stage the waste trains and the coke trains at the same time. Burlington owns and controls most of the tracks and yard in the area. ECDC receives waste from all over the United States, including the east coast and receives a substantial amount of CalHaz waste. It is a major receiver of CalTrans Cal Haz waste. ECDC is owned and operated by BFI and is an aggressive competitor of both Kettleman and Butterfield, according to WMI.